



Mediterranean No Nuclear Neighbourhood

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Dear Mr. Piebalgs,

We're addressing you, to remind you again of a very crucial matter, concerning both the environmental and social safety and development of Europe, just a few months after our coordinated appeal to you, on behalf of more than 160 antinuclear and environmental organisations. We are still deeply concerned about possible EU financial assistance for the construction of the Belene nuclear power plant (NPP) in Northern Bulgaria.

The historical events consisting today's situation are well known: The initial construction plans of the Belene NPP that started at 1987, a year after the Chernobyl disaster, its suspension after the fall of the regime and the public protests as well as the economic, environmental and safety related concerns. The particular strong protests of the members of the Bulgarian Academy of Science against the Belene project, protests based on scientific research concerning the seismogenic nature of the specific area and the many threats for the public safety, have to be particularly mentioned.

So, it seems perfectly inexplicable to the public opinion the fact that , 3 years ago, the Bulgarian Government revived plans for building two reactors at the Belene site and only last year awarded a construction contract to the Russian company "Atomstroyexport", which had put forward a bid in cooperation with the French/German Areva NP. From that time on, Bulgarian Government appealed to a large scale of French, German, Italian, Swiss and US banking groups, asking for investing and financial support. Fortunately enough, the constant and persistent reaction of the international antinuclear and environmental movement achieved the rejection or annulation of the financial support by the great majority of them.

It goes without saying that there are many reasons why non-governmental organizations from throughout Europe are opposed to the financing and realisation of the Belene nuclear facility. First and perhaps foremost, is the fact that the power plant will be erected in a region prone to earthquakes. During the last earthquake, some 120 people died only 12 km from the Belene site in the town of Svishtov. Building a nuclear power plant in close proximity to seismic fault lines is a recipe for disaster. This is one of the key reasons why the Bulgarian Academy of Sciences warned against completing Belene in its 1990 study.

Nevertheless, Bulgarian Government still intends to apply for a 300 Million Euro loan from the EURATOM facility to launch the construction of the Belene NPP! We must also point out that a serious incident took place only last year at the Kosloduy 5 Reactor in Bulgaria, which is a VVER 1000-320 model. Georgi Kastchiev, former head of the Bulgarian Nuclear Safety Agency, who now works at the University of Vienna, reports that the central safety system of the reactor failed. Authorities first remained silent about this incident and rated it a 0 on the INES scale. Almost two months later they were forced to upgrade it to INES 2 and to confirm Dr. Kastchiev's description of the situation. Dr. Kastchiev himself judged the incident as "driving on a highway without breaks" We may also add the severe pollution that threatens the Danube, a river that for two years now, shows an increasing incidence of heavy flooding. Flooding can have a severe impact upon nuclear power operation. In the case of Belene, flooding could for example destabilize the underground on which the power station rests. Just to mention one of many incidents, on April 14, 2006 the BBC reported: "The Danube reached record-high levels and Bulgarian authorities declared a state of emergency in all 22 communities along the country's 450 km stretch of the river. Vidin, a city of 50,000, is ready for possible evacuation.

The scenario that emerges of a soviet-designed nuclear plant set in an area that is prone to earthquakes and flooding in a country where nuclear safety concerns are paid little heed , is indeed frightening. All the more so, if one considers that the storage problems for Belene's radioactive waste have not been solved, that no emergency plan exists and that the environmental impact assessment (EIA) does not seriously consider the seismic and flooding risks nor the risk of a major nuclear accident.

In the wider context of Bulgaria's energy policy, we fear that the construction of the Belene NPP would force Bulgaria's investment policy in the energy sector onto an unsustainable path. First of all, it solidifies Bulgaria's dependency on energy resources from Russia (nuclear technology and fuel). Secondly, it diverts investment capital from the least-cost alternative indicated by the EBRD: energy efficiency. According to Eurostat, Bulgaria is by far the least efficient EU member country and requires 10 times as much energy as the EU average to produce 1 Euro of gross domestic product. The 4+ Billion Euro investment that is required for Belene is therefore in stark contrast to the 200 Million Euro energy efficiency project that Bulgaria is currently carrying out with finances from the EBRD. Investment for Belene would also divert capital from the development of renewable energy sources. In spite of the huge untapped potential for renewable energy sources in the SEE Region, Bulgaria only has an extremely modest programme in this field - one of the most modest in Europe. In this context, it would be

hard to understand, why public European money should now be used to support the nuclear option and its inherent risks for the entire SEE region.

In closing, we would like to add that there is a great deal of opposition to the Belene NPP both in the Belene region, but also across the borders in Romania and Greece, where municipality leaders and organisations representing hundreds of thousands of citizens have declared their opposition to the project, as well as from F.Y.R. of Macedonia, where citizens have charged Bulgaria with violating the Espoo Convention on cross-boundary impacts. Those diplomatic violations are unfortunately still in order. We are deeply sorry to point out that we're afraid that both Espoo and Aarhus Conventions is yet to be ignored either by the Bulgarian or by the Greek government or even worse, by both of them. We're forced to come to this conclusion, as none information whatsoever has been given to the Greek public opinion about the Belene construction nuclear plant project, though Greeks as Bulgarians neighbours have the right to get informed on the situation and feel free to use their legal way to react.

In the past few years, the European Commission has articulated its commitment to environmental issues. Supporting a dangerous nuclear power plant that would not be granted a construction permit in countries like Germany or the U.S. and that has not been seen fit for financing by private banks, would call these commitments into question.

As representatives of the Mediterranean No Nuclear Neighborhood -MN³, a newly founded Network that synchronises the efforts of many antinuclear and environmental groups from the Mediterranean region, we therefore urgently call upon you to show concern for the safety of European citizens and safeguard the rights of future generations: not to risk a second Chernobyl by financing a nuclear power plant in an earthquake zone, say No to the Belene project! European public money must not be used to back a venture that will endanger the safety of European citizens.

We look forward to your reply.

Sincerely yours,

The executive Secretariat of the Mediterranean No Nuclear Neighbourhood,

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